

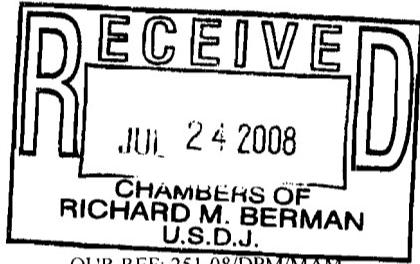
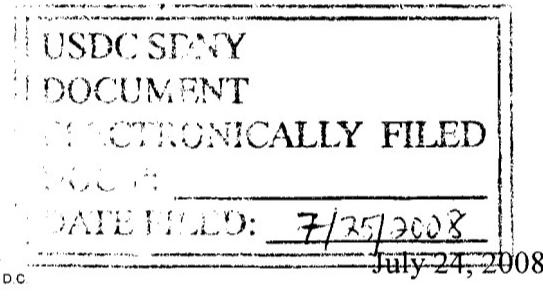
GEORGE B. FREEHILL  
 WILLIAM L. JUSKA, JR.  
 JAMES L. ROSS\*  
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 JOHN J. WALSH\*  
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 MANUEL A. MOLINA  
 LAWRENCE J. KAHN\*  
 JUSTIN T. NASTRO\*  
 PAMELA L. SCHULTZ\*△  
 DANIEL J. FITZGERALD\*△  
 JILL A. TAFT  
 MICHAEL C. ELLIOTT\*

\* ALSO ADMITTED IN NEW JERSEY  
 △ ALSO ADMITTED IN CONNECTICUT  
 † ALSO ADMITTED IN WASHINGTON, D.C.  
 □ ALSO ADMITTED IN LOUISIANA

LAW OFFICES OF  
**FREEHILL HOGAN & MAHAR LLP**  
 80 PINE STREET  
 NEW YORK, N.Y. 10005-1759  
 TELEPHONE (212) 425-1900  
 FACSIMILE (212) 425-1901  
 E-MAIL: [reception@freehill.com](mailto:reception@freehill.com)  
[www.freehill.com](http://www.freehill.com)

NEW JERSEY OFFICE  
 850 BERGEN AVENUE  
 JERSEY CITY, N.J. 07306  
 TELEPHONE (973) 623-5514  
 FACSIMILE (973) 623-3813

CONNECTICUT OFFICE  
 23 OLD KINGS HIGHWAY SOUTH  
 DARIEN, CT 06820-4538  
 TELEPHONE: (203) 921-1913  
 FACSIMILE (203) 358-8377



OUR REF: 251-08/DPM/MAM

### BY HAND

The Honorable Richard M. Berman  
 Daniel Patrick Moynihan  
 United States Courthouse  
 500 Pearl St., Room 650  
 New York, NY 10007

**MEMO ENDORSED**  
 p. 2

Re: American Steamship Owners Mutual P&I Assoc. Inc. v.  
 Ship & Shore Services, Ltd., et al. – 08 CV 4359 (RMB)

Dear Judge Berman:

We represent the plaintiff in the captioned matter and write to request that the conference scheduled for July 29, 2008 be adjourned *sine die*.

By way of background, Plaintiff initiated this action on May 8, 2008 seeking security, up to the amount of \$446,445.38, for its maritime claims via an attachment of the Defendants' property in this District pursuant to Rule B. The requested Rule B attachment was granted by this Court on the same day, and the attachment order was served on various New York banks. To date, Plaintiff has successfully restrained the total sum of \$284,239.81 of Defendants' property. Further, Plaintiff has provided prompt Notices of Attachment to Defendants. In fact, as Exhibits A and B annexed hereto demonstrate, Defendants are fully aware of the attachments and of the instant Rule B maritime action against them. Defendants, however, have failed to appear or to move to vacate the attachments. We are continuing our efforts to restrain funds of the Defendants to fully secure our client's claim.

In light of the foregoing, we therefore respectfully request that Your Honor grant the instant application. Alternatively, we request that the conference be adjourned 60 days.

July 24, 2008  
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We thank the Court for its attention to this matter.

Very truly yours,

FREEHILL HOGAN & MAHAR, LLP

*Manuel A. Molina*  
Manuel A. Molina

We can discuss at the conference  
on 7/29/08 at 9:45 a.m.

SO ORDERED:

Date: 7/25/08

*Richard A. Berman*  
Richard M. Berman, U.S.D.J.

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FREEHILL, HOGAN & MAHAR LLP